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EUROPE, LISTEN AND RESPOND

ENHANCING THE EUROPEAN COMMISSION'S ONLINE PUBLIC CONSULTATION TOOL

EUROPAEUM SCHOLARSHIP PROGRAMME – COHORT JANUARY 2018 / NOVEMBER 2019

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EUROPE, LISTEN AND RESPOND

1. Introduction

European integration has delivered fifty years of stability, peace and economic prosperity. [...] Yet despite its achievements, many Europeans feel alienated from the Union's work. [...] People do not necessarily feel less European. They still expect Europe-what they want. In other words, people have disappointed expectations, but expectations nevertheless (European Commission 2001: 7).

This statement reads as a very adequate description of the current state of the European Union – but dates from 2001. Almost two decades later, the European Union faces similar challenges. The gap between Brussels and the European periphery has not closed; some might even argue that it has widened. Dissatisfaction with the EU's work amidst the Euro and Migration crises has spurred populist parties and further reduced trust towards EU institutions. The European elites can no longer rely on a permissive consensus paving the way for further integration but face a constraining dissensus (Hooghe and Marks 2009), which makes it necessary to *convince* rather than bypass the general public. Today, the EU's democratic polity can no longer merely rest on passive representation but must be re-invented and re-activated.

Participation has stood at the centre of attention for the Commission since its 2001 White Paper on European Governance. An important democratic innovation in the EU consists of inviting citizens and interest groups to participate in the legislative process of the European Commission (Smismans 2016). European Public Consultations are one of the main participation tools available to EU citizens. The European Commission currently conducts public consultations through an online tool called "Have Your Say". Citizens and other stakeholders can express their opinion "on the scope, policies and added value of EU action for new initiatives, or evaluations of existing policies and laws". The number of citizens involved has gradually increased, reaching around 200,000 contributors annually. However, 80% of these participate only once. This disengagement highlights that the European Commission has not been effective in sustaining citizen involvement.

Online consultations are a double-edge sword. They have the potential to strengthen democratic legitimacy by allowing citizens to express their voice (Catt and Murphy 2003). This is based on Habermas's conceptualization of democratic legitimacy. He suggests that citizens may regard their laws as legitimate if the democratic process warrants the presumption that outcomes are products of a sufficiently inclusive deliberative process of opinion and will-formation (Habermas 2015). However, if they are not executed appropriately, online consultations can be damaging, even causing heightened dissatisfaction and frustration among participants and broadening the gap between citizens and institutions.

Responsiveness to citizens' concerns is key to the success of the European Public Consultations (EPCs) process. At the moment, the provision of feedback to citizens remains the "Achilles' heel of the Commission's open consultation" (Quittkat 2011). If feedback on citizens' opinions is not provided and if alternative decisions are not justified, this can have detrimental effects on process legitimacy (Kies 2013). Additionally, there is a major lack of transparency in how the European Commission reports on the outcomes of EPCs (Kies 2013). Yet, EPCs offer great potential for citizen participation: there are many examples of participation tools across Europe, at local and national level, that seem to function better than the EPCs.

To restore public trust in EU institutions, it is vital to address the shortcomings of the EC's responses to participants. In this paper, we analyse the functioning of online consultation tools in eight European countries in order to improve the consultation process, focusing on the provision of feedback to citizens. We proceed as follows. Firstly, we ground our analysis on theoretical insights from participation and democratic theory using a multidisciplinary approach. After a justification for our case selection, we then proceed to a cross-country comparison of consultation tools at the national and local level, looking at four dimensions: institutionalization, report content, timing and sustained dialogue. Finally, learning from other European case studies, we provide recommendations to the European Commission.

2. Theoretical perspectives on feedback

It is important to note upfront that participation should not be equated with direct democracy, which has its own set of problems, for instance in the field of minority rights (Haskell 2018). Hence, consultations are by necessity not binding (Tilly 2000). This further underlines the importance of providing citizens with feedback on their responses to the consultations, since their responses will not necessarily be translated directly into policy. In the following paragraphs, we elaborate on the theoretical perspectives of providing feedback to citizens in the context of public participation procedures. Based on existing literature on this topic, we have divided this section into four: how to institutionalize the provision of feedback; what to include in the feedback report; when to provide feedback; and how to sustain contact.

2.1. How to institutionalize the provision of feedback?

Previous studies have shown that the institutionalization of citizens' participative procedures is a key factor in determining their relevance (e.g. Kies 2016). Institutionalization involves embedding consultations in a clear, legal framework, with fair and transparent regulation and a main authority responsible for the consultation. At the moment, individual Directorate-Generals are responsible for public consultations concerning policy in their field. However, there is no legally binding obligation for them to give any explanation directly to participant taking part in an online consultation. This is so, despite the 2015 Communication 'Better regulation for better results -

An EU agenda', in which the EU Commission stated that: there is a need for explaining better their policy choices and why certain decisions are taken (EC 2015).

2.2. What to include in the feedback report?

The *sine qua non* and bare minimum of providing feedback to participants of open consultations is a summary report on the collected responses (Quittkat 2011). Public consultations can be designed in at least three distinct forms: open-ended comments, specific responses to questionnaires, and the crafting of proposals by participants (Smith 2013). There is an inherent tension between a design that allows for open-ended answers or proposals and a design that is aimed at collecting closed answers to survey-like questions. Whereas the former often produces better and more detailed responses, ordering and aggregating these responses is harder and more time-consuming than the aggregation of closed survey questions. Binary or closed survey questions are found to be a “robust mode of communication even when the preferences and policy space are non-binary” (Kawamura 2011), while at the same time facilitating proper feedback to citizens.

Currently, most EC open consultations are based on closed questions, which are summarized in “bulky tables and diagrams” (Quittkat 2011). While this is a valuable first step, digital technology would provide opportunities for better and more interactive modes of feedback (Bartlett and Grabbe 2015). For example, it would allow the European Commission to show citizens how their individual policy preferences compare with the aggregate preferences or to what extent there are country differences regarding a given policy proposal. More importantly, it would allow the EC to show to what extent and how the public consultations have influenced policy-making (Quittkat 2011). This is currently lacking, but an easily accessible online tool that shows whether and how the results of a public consultation are taken into consideration could fulfil essential aims of the feedback process (ibid.). It is important in this respect that feedback is concrete and clearly states how the responses of citizens will be taken into account. As Talpin and Monnoyer-Smith (2013) note for the case of an experimental citizen deliberation project: merely stating that the voices of citizens are heard and taken into account is not enough. If citizens feel that their opinion has not had an impact on policy-making, this could actually lead to increased cynicism from participants.

2.3. When to provide feedback?

Although there is no specific bibliography related to policy-making and consultation processes focused on this aspect, the time of response is a clear issue in other disciplines such as business, communication, and advertising. The most important lesson we draw from these fields is that feedback to stakeholders is ideally given immediately and in an interactive way (Carrillo 2005; Martí et al. 2012). This is even more important given that we live in a digital world of communication in which interactivity with users is common (Nobre and Silva 2014). Social networks play a large role in this world, which means that users are accustomed to

instantaneous and continuous communication as well as feedback (Felix et al. 2017). In order to successfully engage citizens, participation platforms should therefore mimic these ways of providing feedback to citizens.

2.4. How to sustain contact?

As mentioned in the previous paragraph, citizens are living in a digital world of communication in which they are used to interactivity in their contact with others (Nobre and Silva 2014). Furthermore, communication in the current era should be engaging and inviting to citizens. Therefore, a newsletter that is sent to respondents or potential respondents could be supplemented with a video or multimedia aids which would increase the comprehensiveness of the results (Palmer et al. 2012). All these actions would lead to a good-practice model of feedback which has a positive impact on citizens' confidence and on their engagement with policy-making (Wünsch and Hohl 2009). However, the inclusiveness of the process should be kept in mind (Kies 2016). Policy makers should avoid solely maintaining sustained contact with citizens who are already highly engaged. Therefore, sustaining contact should not come at the expense of attracting new citizens to the initiative and ideally should actively involve those who are not yet engaged (ibid.).

3. Methods and Case Selection

This policy paper presents recommendations on how to improve the impact of public consultations by focusing on what we identified to be the most important aspect of public engagement: *responsiveness*, that is, the ways in which the European Commission communicates feedback on EPCs to participating citizens. It does so by drawing on an exploratory analysis of 11 public consultation platforms in Europe. We adopted a multidisciplinary approach drawing on insights from political science, public administration, sociology, law, and communication science, to better capture good practices in providing feedback in the consultation process.

The case selection was based on two considerations: firstly, we accounted for variation in scale by covering not only national platforms (e.g. the Croatian platform Savjetovanja), but also local platforms (e.g. Decidim Barcelona) as well as tools on the intermediate level (e.g. Baden-Württemberg, Germany). Our analysis includes consultation platforms from Spain, Germany, the Netherlands, Estonia, Croatia, Italy, the UK, and Poland. Secondly, we accounted for differences in scope by including public consultations conducted by public authorities, political parties (e.g. the Movimento 5 Stelle's Rousseau Platform) and supranational bodies (the European Commission). An overview of the platforms we analysed can be found in Table 1.

By building on the theoretical perspectives outlined in the previous section, we used four quality criteria (introduced in the following section) to identify good practices already in use across Europe, which serve as a baseline to formulate broadly applicable recommendations. To this aim, we not only drew on publicly available information but also base our advice on our personal experience of participating in the consultation processes as well as on semi-structured interviews which we conducted with officials mandated to organize, conduct, and supervise the respective tools (a list of interviewees is provided in Appendix 1).

Country	Name of the platform	Government level
Croatia	e-Savjetovanja	National
Estonia	E-Consultation System	National
Germany	Beteiligungsportal Baden-Württemberg	Regional
	Mein Berlin	Local
Italy	Rousseau	National/Party-related
Netherlands	Internet Consultations	National
Poland	Legislacja RCL	National
Spain	Decide Madrid	Local
	Decidim Barcelona	Local
United Kingdom	Consultations & Surveys Manchester City	Local

Table 1. Overview of the platforms included in the analysis.

4. Analysis

Building on the theoretical perspectives outlined above and the deficiencies of the current system, we suggest several recommendations for improving the ways in which the European Commission communicates feedback to participants of online consultations. The analysis is structured as follows. Firstly, we have divided the feedback process into four areas based on the theoretical review: institutionalization, report content (with a specific focus on personalization which emerged from our case studies), timing, and sustained dialogue. Secondly, for each of these four areas, we have identified: firstly, the *status quo* with regards

to how the European Commission currently operates; secondly, the lessons we can learn from other consultation platforms in Europe; and thirdly, the recommendations for the European Commission, which we derive from these good practices and our theoretical analysis.

4.1. Institutionalization

Status Quo

Starting from the late 1990s, the EU has been more and more committed to the promotion of a culture of dialogue and of the participation of stakeholders in the legislative process (EC 2001). This was given a new boost in 2015, when the Commission issued an extensive package of measures to improve and strengthen EU policy-making. These measures required a more transparent and accountable decision-making process, as well as a better harmonization of national and supranational procedures. Along this line, in 2016 an interinstitutional agreement between the three institutions involved in the EU legislative process (the European Parliament, Council and Commission) was concluded. However, there is no legally binding obligation for EU institutions to provide an explanation to the participants of a European Public Consultation. Moreover, there is no clear definition of consultation in EU legal and policy documents. This might imply several inconsistencies in the feedback provided to participants across various consultations.

The Commission's online public consultation process is currently monitored by a group of different departments of the Commission, the Interservice Steering Group (ISG). The ISG reviews all the key elements and is responsible for the internal quality check of a consultation, along with the responsible Secretariat General units which horizontally coordinate and supervise the process. There is, however, no obligation to provide detailed feedback to participants of a public consultation, and participants are not allowed to submit any complaint to the ISG.

Lessons Learned

At a local level, cities like Barcelona and Madrid defined the consultation process in the municipality's legal or policy documents. The same has been done at a national level, for example in Croatia where public consultations are established by law and the legal framework is accessible to everyone. A clear definition of the public consultation process is necessary not only to avoid inconsistencies but also to ensure transparency in policy-making. Similarly, Barcelona has established a regulation which includes principles guiding the consultation process. To ensure that those principles are respected, a commission of experts supervises each consultation process; additionally, the protection of rights commission ensures the respect of the rights of the participants. In Madrid, there is a specific commission dealing with all the consultation processes (Interview with Prieto 2019). Despite those good practices, the presence of independent monitoring bodies, ensuring the accountability of the consultation

process, is an aspect that remains underdeveloped in most of the other cases that we have studied, and it remains an important deficiency of the EPCs.

Recommendations

In order to a baseline level of quality in responses and to avoid major inconsistencies in the feedback provided to participants across various consultations, we suggest further institutionalization of the European Public Consultation mechanism which should be better embedded in the decision-making process of the EU institutions. Any new measure aiming at reinforcing the legitimacy of EU decision-making should be effective and efficient. Advancing the institutionalization of the EPCs thus need not imply a complexification of existing procedures.

Our first recommendation would therefore be the creation of an “Office for the EPCs” which would gather together EU officers working on public consultations, a pool of independent experts, as well as representatives of member state authorities involved in public consultations. Members of the Office would routinely be involved in a Public Consultation Forum, where all the national and supranational bodies involved in public consultations could exchange good practices. The aim of the Office will be to improve public consultation processes across the EU in making their practices more transparent, predictable, and coherent. The Office will thus be enabled to provide a clear definition of the European Public Consultation and its processes, as well as a set of guidelines to assess the quality of such activities. Further, the work of the Office and the consultation processes should be monitored by an independent supervisory body. Thus, we propose the establishment of a direct connection with the European ombudsperson. The right to legal remedy in case of violations of the right to privacy during the consultation processes should be reaffirmed.

A further step that could be taken during the institutionalization process is the negotiation of an EU Directive on European Public Consultations. Such an instrument would have the potential to improve the quality of the EPCs and enhance the coherence among the various European, national, and local practices, while leaving a certain margin of discretion to competent authorities when it comes to its implementation. The EU Directive on European Public Consultations should include a clear definition of the public consultation and its processes. The legal framework defined by the Directive should include an explicit obligation to account for the decisions taken in an appropriate way. Such an obligation could be performed through collective or individual means, but it should always be publicly accessible and shareable.

4.2. Personalization

Status quo

According to current guidelines, the European Commission should provide feedback to citizens who responded to public consultations in the form of a self-standing synopsis

report or condensed in ‘impact assessment reports’ (EC 2019: 18). The responses to consultations should also be summarized in the explanatory memorandum accompanying a Commission proposal. However, according to a recent survey on public consultations by the Commission, nearly 40% of the respondents to the public consultations are currently dissatisfied with the way the Commission reports on the outcomes of consultations (EC 2019: 18). It remains unclear to many how their responses have been used in the legislative process. Finally, contributors mention that they would like more systematic reports and better individualized feedback. Furthermore, a number of Commission staff reported that they lack the expertise to draft clear and understandable questionnaires for public consultations, which reduces the potential of the consultations and thus also inhibits the possibility of providing good feedback to citizens (EC 2019).

Lessons learned

In a similar vein to the synopsis reports of the European Commission, we see that in a majority of local, regional, and national public consultation platforms only synopsis reports of the responses are provided (e.g. The Netherlands, Baden-Wurtemberg, Estonia, Madrid and Barcelona). However, some notable exceptions to this rule exist: the office for NGOs in Croatia and the consultation platforms used by Polish ministries (Interview with Relić 2019; Interview with Brzozowska-Katner 2019). In the Croatian case, we see that the Office is obliged to justify and explain any refusal of a participant’s suggestion. This means that participants will receive an individualized reply when their comment is not taken under consideration. Although it is common practice in both Croatia and Poland to address similar comments collectively, this practice is still very time-consuming and it puts a strain on the civil servants working on the respective dossiers. Apart from guidelines on how to draft the summary reports and analysis, Croatia has two types of educational programs which are offered to diverse governmental bodies in order to help their staff with facilitating public consultations in more comprehensive and structured manner (Interview with Relić 2019). Finally, Italy seems to be a deviant case in the sense that not civil servants, but MPs provide feedback to citizens. They can do this in an individualized way, but there is no obligation to do so.

Recommendation

We see that there is a clear call for more personalized feedback in the European Commission’s public consultation process. This call should be taken seriously, especially since we have already shown from a theoretical perspective that merely stating that citizens’ opinions are taken into account is insufficient for giving citizens the feeling that their voice is heard. However, at the same time, we have seen in the cases of Croatia and Poland that even small-scale consultations with individualized feedback put a strain on civil servants working on the departments. We therefore propose a technical solution to this trade-off. We have already noted that, especially in the case of closed question surveys, technology provides ample opportunities for comparing the responses of citizens with those of other respondents and with the eventual policy decision. This thus provides civil servants with opportunities to give

semi-individualized feedback to citizens and explain why certain policy choices are made, especially when these choices deviate from the respondent's opinion. Furthermore, digital advances in the field of machine learning provide the opportunity to automatically determine the respondent's standpoint in a qualitative response to a public consultation. These technological advancements would enable the Commission to provide semi-individualized feedback without responding to them personally one by one. The need for staff training also cannot be ignored (EC 2019). However, this challenge seems to be easy to tackle and Croatia could easily serve as an example to be followed.

4.3. Timing

Status quo

It is important to mention that, in 2015, the European Commission committed in principle to four weeks for proper feedback (apart from the automatic notification that the participants get when their contribution has been registered by the system). However, the literature review noted that this may be too short for replying to consultations on complex issues and with large numbers of respondents given that timely feedback is at odds with quality (Chase & Schlosser 2015; Delogu 2016). Evidence for this is offered by the recent European Commission survey which showed that nearly 40% of the respondents are dissatisfied with the way the Commission reports on the result of the consultations (EC 2019).

Lessons learned

Taking into consideration the analysed cases, we have found that there is no consensus on how long before a response should be provided. In some consultations processes, such as Decide Madrid, there is an automatized and general first response to all participants in the consultation process, confirming the success of their participation and that data has been recorded properly. After that, the timing of the response depends on the policy-making process and there is no fixed time within which the platform must provide feedback to citizens (Interview with Prieto 2019). On the other hand, other participation platforms, such as the Croatia e-Consultation platform, have chosen to provide personalized feedback to every single participant within a maximum of 30 days after the end of the consultation (Interview with Relić 2019). This might ensure the quality of the feedback, but it only works with limited numbers of responses and even then, it is cost-ineffective and time-consuming for the bodies in charge of running the consultation process. Finally, Decidim in Barcelona externalized the process through a call for tender and, thanks to external bodies linked to the city council, a period of fewer than 15 days for giving feedback has been achieved (Interview with Monterde 2019). This ensures quality and timeliness, but at a cost: not only is this way of working expensive, there are also concerns about the privacy of respondents (cf. Interview with Prieto 2019).

Recommendation

Taking all of this into consideration, the recommendation regarding timing is that feedback should be provided within an adequate period and a maximum duration should be reformulated by the European Commission. Stating a clear term would manage the expectations of respondents while at the same time allowing civil servants time to provide a high-quality response. Furthermore, technological advancements would enable civil servants to provide semi-personalized feedback within a reasonable time period.

4.4. Sustained Dialogue

Status quo

A sustained dialogue between the public bodies running the consultation and its participants is important since it leads to a good-practice model of feedback, which has a positive impact on citizens' confidence and on their engagement with policy-making (Wünsch and Hohl 2009). The European Commission has established that the respondent, and in general every interested person, has the option to register and receive notifications via the "Have Your Say" portal for all published initiatives on this platform. Additionally, any interested citizen can subscribe to follow the progress of existing consultations and hear about relevant future consultations, either for the specific policy field the participant has indicated during registration or for a particular initiative in which they are interested.

Lessons learned

It is important that participants have opted-in to receiving any communications and that all Privacy and Electronic Communications Regulations (PECR) are respected, as Borja Prieto from Decide Madrid highlights (2019). Also, respondents mention that consultation processes should be neutral. This suggests that sending specific or related consultations to previous participants is undesirable, as this could lead to a biased process (Bunea 2017; Interview with Prieto 2019). In many cases, registered users have the option to choose to receive information about other consultations, even specifying their interest in future consultations issued by certain public bodies or addressing particular topics (e.g. The Netherlands, Croatia, Madrid, and Barcelona). Decidim Barcelona offers a particularly good practice here, since the newsletters contain feedback on previous consultations in an engaging way, for instance by making short video clips of the outcomes (Interview with Monterde 2019).

However, it is interesting to highlight that in other cases, such as in Poland, the Ministry of Entrepreneurship and Technology also allows people who are interested in getting involved in the legislative process to provide their personal details. On this basis, the Ministry creates a stakeholder's profile and can send a request for opinions whenever the legislation draft fits the profile of a particular stakeholder (Interview with Brzozowska-Katner 2019). This process saves

a lot of time looking for potential participants and it gives the general public the feeling that they are able to participate in matters relevant to them. However, concerns about biases in stakeholder selection arise from this method.

Recommendation

In order to reduce bias problems, it is important to promote public consultations publicly and widely. Therefore, all future consultations should be published on the platform. However, this does not exclude the option of sending a newsletter to previous respondents who indicated that they would be interested in this. This newsletter should include feedback on previous responses. Ideally, this feedback should be provided in an engaging way using multimedia aids. The use of these would increase the comprehensiveness of the contents (Palmer et al. 2012), which should be published on the consultation platform. Overall then, sustained dialogue with participants should be designed to trigger further engagement with public consultation.

5. Conclusion

Good feedback enables a dialogue between citizens and policymakers. It shows that European institutions are accountable, communicates that policies are informed by participants' perspectives, and therefore keeps citizens connected with EU institutions. Improving this area of the public consultation process will have a positive impact on public participation and engagement. Strong feedback processes thus represent a vital and strategic area for improvement. Furthermore, improved feedback processes do not just represent an ideal scenario but are essential for countering the risk that poorly executed EPCs will leave participants more dissatisfied and disengaged. This damaging effect would be the exact opposite of what a consultation should achieve.

Accordingly, our case studies identified good practices for feedback in four areas: they show that **good feedback must be institutionally-supported, personalized, timely, and sustained**. Each of these plays an important role in addressing the weaknesses of the current tool:

- Institutional support would ensure political and legal commitment towards responsiveness, that the Commission is transparent on how the results of EPCs inform policy-making, and that feedback is given consistently and according to clear guidelines which would ensure a baseline level of quality.
- Personalizing feedback in an efficient way would allow the Commission to communicate directly with the citizen, addressing how their views were taken into account and showing that every contribution was heard.
- Timely feedback ensures that participants are kept engaged during the window of time that they are still interested and communicates that responding to citizens' views is a priority for the Commission.

- Sustained dialogue with citizens would enable the Commission to keep interested citizens involved in the policy-making process and can be carried out in a way which protects the individual's privacy and control over the use of their personal details.

Thus, improved feedback mechanisms have the potential to overturn the perception that European institutions are not representative of European citizens. They show that policy-makers at a European level are interested in what citizens have to say.

On the pragmatic side, our case studies also identified several trade-offs in the provision of good feedback. For instance, swift responses come at the cost of sophisticated, high-quality responses to complex issues. Similarly, personalized feedback involves high costs in terms of time and effort. Thus, we recognize that implementing these recommendations may increase the administrative costs of public consultation. Therefore, in conclusion, our overarching recommendation is **to prioritize the quality of consultations over quantity**. Currently, a large number of policy topics are put to the general public, including many highly technical topics and at a level that is unsustainable for attracting real interest. We would therefore suggest reducing the quantity of public consultations in order to ensure that all public consultations can be implemented with maximum quality in line with the recommendations above. Maximizing quality of EPCs over quantity will enable strong feedback processes and will ensure that these changes can have a real impact, fostering a close connection between EU institutions and the citizens they represent.

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APPENDIX 1 – Research Methodology – List of interviews

Research Methodology		
Country	Method	Additional information
Croatia	Skype Interview	Interview with Nemanja Relić Advisor to the Government and the Government Office, Office for NGOs of the Government of the Republic of Croatia, Department for Strategic Planning, Programming and Information Date: 22.05.2019.
Estonia	Email Interview	Interview with Ivar Hendla, Strategy Unit Adviser Government Office of Estonia. Date: 05.03.2019.
EU	Email Interview	Email from the European Commission. Date: 18.07.2019.
Poland	Personal Interview	Interview with Marta Brzozowska-Katner, member of Better Regulation Team within Ministry of Entrepreneurship and Technology Date: 18.06.2019
Spain (Barcelona)	Personal Phone Interviews	Interview with Arnau Monterde, promoter of the Decidim project in Barcelona. He works at UOC (University) and Democratic Innovation Laboratory of the City Council. Date: 30.05.2019. Interview with Enrique Muguerza, Head of Institutional Extension Unit, Citizen Participation, (CONSUL team) Madrid City Council. Date: 16.10.2018, phone call. Interview with Manel Gil, EDAS Consultancy Barcelona Date: 28.05.2019 phone call.
Spain (Madrid)	Personal Interview	Interview with Francisco de Borja Prieto Ursuah Head of Service, Service of promotion, dissemination and institutional extension, Transparency office Date: 17.05.2019.
United Kingdom	Email Interview	Interview with Dawn Billups, Senior Researcher at Manchester City Council Date: 22.03.2019.